

## **REMARKS**

Claims 1-15 remain in the application for consideration of the Examiner.

Reconsideration and withdrawal of the outstanding rejections are respectfully requested in light of the following remarks.

Claims 1, 2, 4, and 7-15 were rejected under 35 U.S.C. § 103 as being unpatentable over Lee in view of Lupinski; and Claims 5 and 6 were rejected under 35 U.S.C. § 103 as being unpatentable over Lee and Lupinski in view of Hiroshi.

These rejections are respectfully traversed.

It is respectfully submitted that Lee does not disclose or suggest the presently claimed invention including the plurality of contact pads disposed on the first surface of the substrate and a second surface of the substrate being directly attached to the preactivated polymer level.

Applicants agree with the Examiner that Lee does not disclose the protecting adhesive layer being a protective polymer having been preactivated.

It is respectfully submitted that Lupinski does not disclose or suggest the presently claimed invention including a plurality of contact pads disposed on the first surface of the substrate and the second surface of the substrate being directly attached to the preactivated polymer level.

Lupinski does not disclose a preactive layer being used with a insulating substrate that bears a relationship to contact pads.

Furthermore, whether or not Hiroshi discloses forming a metal layer on a protective adhesive layer and whether one of ordinary skill in the art would have

modified either Lee or Lupinski is of no moment since the resulting construction would in no way disclose or suggest the presently claimed invention.

The Examiner alleges that Applicants argument has no immediate apparent relevance to the issues presented by the rejection since the Applicant cannot show obviousness by attacking reference individually where the rejection is based on the combination of references.

Notwithstanding the allegations of the Examiner, none of the references discloses a plurality of contact pads disposed on the first surface of the substrate and the second surface of the substrate being directly attached to the preactivated polymer level.

Applicants respectfully submit that the Examiner has used impermissible hindsight in order to reject the Applicant's claims. More particularly, the Examiner has pieced together the teachings of the prior art using the instant specification as a guide.

Such rejections are clearly impermissible.

Applicants appreciate the indication that Claim 3 is allowed.

By the instant amendment, Claim 3 has been placed in independent form including the limitations of the base claim and any intervening claims.

In light of the above, it is respectfully submitted that the present application is in condition for allowance, and notice to that effect is respectfully requested.

While it is believed that the instant response places the application in condition for allowance, should the Examiner have any further comments or suggestions, it is respectfully requested that the Examiner contact the undersigned in order to expeditiously resolve any outstanding issues.

To the extent necessary, Applicant petitions for an Extension of Time under 37 CFR 1.136. Please charge any fees in connection with the filing of this paper, including extension of time fees, to the deposit account of Texas Instruments Incorporated, Account No. 20-0668.

Respectfully submitted,



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